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January 22, 2019

Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square, Room 2103 New York, New York 10007

Re: Doe v. East Side Club, et al.

<u>Docket</u>: <u>1:18-cv-11324-KPF</u>

Honorable District Judge Failla:

My firm represents all the Defendants in the above captioned action. I am writing on consent of my adversary who joins in this request. On January 10, 2019, counsel for Plaintiff submitted a joint letter motion requesting "Your Honor allow all individually names parties to proceed under a pseudonym given the sensitive nature of this case... The parties agree to amend their pleadings for the sole purpose of allowing all individually named parties to proceed under a pseudonym". See ECF Doc. 19. Your Honor granted that request on January 11, 2019.

Upon my inspection of the docket, my client's names continue to appear on many of the additional docket entries. More specifically, docket entries 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17. To effectuate the agreement of counsel that all individual parties be permitted to proceed confidentially under a pseudonym, I am writing on consent to respectfully request all documents identified above be sealed. Moreover, a Pacer search earlier confirmed that my client's identities remain on file with the Clerk's office, rather than sealed and confidential. We are also therefore respectfully requesting that an Order be issued to direct the Clerk of the Court to ensure that the names of all the individual parties be concealed on PACER and any other electronic databases maintained by the Court open to public inspection.

Most respectfully,

T/D/S/

Thomas D. Shanahan

Application GRANTED. The Court thanks the parties for alerting it to the continued availability of the parties' names on the docket and in court records. It is hereby ordered that all documents identified above be sealed.

The Clerk of Court is hereby directed to ensure that the names of all the individual parties be concealed on PACER, and also on any other electronic databases that are maintained by the Court and open to public inspection.

Dated: January 22, 2019

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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